

**UNITED STATES U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ERIKA LEE,

Plaintiff,

v.

DELTA AIR LINES, INC., DAVID NEEDHAM
& JOSE ROSADO,

Defendants.

Civil Action No. 1:22-cv-8618-DEH-RWL

EXHIBIT A

TO

DELTA'S LETTER

DATED

APRIL 7, 2025

Fleming, Michael F.

From: Fleming, Michael F.
Sent: Thursday, February 27, 2025 5:13 PM
To: 'Erika Lee'
Cc: Rosenstein, Ira G.; Gunn, Imani D.
Subject: RE: Lee v. Delta - Delta's Notice of Plaintiff's Deposition
Attachments: Lee v. Delta - Delta's Amended Notice of Deposition to Plaintiff (2.27.25).pdf

Ms. Lee,

Thank you. April 4 also works for our side. Attached is an amended notice of deposition.

Michael F. Fleming

Morgan, Lewis & Bockius LLP

101 Park Avenue | New York, NY 10178-0060

Direct: +1.212.309.6207 | Main: +1.212.309.6000 | Fax: +1.212.309.6001

michael.fleming@morganlewis.com | www.morganlewis.com



From: Erika Lee <leerikalatise@gmail.com>
Sent: Wednesday, February 26, 2025 4:03 PM
To: Fleming, Michael F. <michael.fleming@morganlewis.com>
Subject: Re: Lee v. Delta - Delta's Notice of Plaintiff's Deposition

[EXTERNAL EMAIL]

April 4

On Monday, February 24, 2025, Fleming, Michael F. <michael.fleming@morganlewis.com> wrote:

Ms. Lee,

Unfortunately, we also cannot do March 28. Do you have availability between April 1 and April 4?

Michael F. Fleming

Morgan, Lewis & Bockius LLP

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From: Erika Lee <leerikalatise@gmail.com>
Sent: Sunday, February 23, 2025 7:34:19 PM
To: Gunn, Imani D. <imani.gunn@morganlewis.com>
Subject: Re: Lee v. Delta - Delta's Notice of Plaintiff's Deposition

[EXTERNAL EMAIL]

March 28.

On Saturday, February 22, 2025, Gunn, Imani D. <imani.gunn@morganlewis.com> wrote:

Ms. Lee,

Unfortunately, March 31st does not work on our end. Could you please provide a few additional dates of availability in or around that same week?

Thank you,

Imani D. Gunn

Morgan, Lewis & Bockius LLP

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From: Erika Lee <leerikalatise@gmail.com>
Sent: Friday, February 21, 2025 8:42 PM

To: Gunn, Imani D. <imani.gunn@morganlewis.com>

Subject: Re: Lee v. Delta - Delta's Notice of Plaintiff's Deposition

[EXTERNAL EMAIL]

March 31 thanks.

On Tuesday, February 18, 2025, Gunn, Imani D. <imani.gunn@morganlewis.com> wrote:

Ms. Lee,

Please provide your availability for a deposition for the month of March.

Thank you,

Imani D. Gunn

Morgan, Lewis & Bockius LLP

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Direct: +1.212.309.6325 | Main: +1.212.309.6000 | Fax: +1.212.309.6001

imani.gunn@morganlewis.com | www.morganlewis.com



From: Erika Lee <leerikalatise@gmail.com>

Sent: Tuesday, February 18, 2025 11:45 AM

To: Gunn, Imani D. <imani.gunn@morganlewis.com>

Subject: Re: Lee v. Delta - Delta's Notice of Plaintiff's Deposition

[EXTERNAL EMAIL]

Ms. Gunn,

This date does not work for me.

On Friday, February 14, 2025, Gunn, Imani D. <imani.gunn@morganlewis.com> wrote:

Ms. Lee,

Attached, please find Delta's Notice of your Deposition for February 28, 2025 at Morgan Lewis' New York offices. Please confirm that this date works for you.

Thank you,

Imani D. Gunn

Morgan, Lewis & Bockius LLP

[101 Park Avenue | New York, NY 10178-0060](#)

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